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May 6, 2024

**Via CM/ECF**

Hon. Jennifer E. Willis  
United States District Court for the Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square New York, NY 10007

**Re: *Azima, et al. v. Dechert LLP, et al.*, 1:22-CV-08728-PGG-JW;  
Notice of Supplemental Authority**

Dear Judge Willis:

We write to respectfully inform the Court of a recent development concerning Defendant Amit Forlit in the above captioned case. According to a court docket in the U.K., the United States government is seeking to extradite Mr. Forlit on three criminal charges: conspiracy to commit computer hacking; wire fraud; and conspiracy to commit wire fraud. *See* Ex. 1, Westminster Magistrates' Court Docket.

Mr. Forlit appeared in Westminster Magistrates' Court in the United Kingdom for extradition proceedings following his arrest on May 2, 2024, where a U.K. prosecutor representing the United States government told the court that Mr. Forlit "is accused of engaging in a hack for hire scheme." *See* Ex. 2, Sam Tobin, *Israeli private eye arrested in London over alleged hacking for US firm*, Reuters (May 2, 2024), <https://www.reuters.com/world/israeli-private-eye-arrested-uk-over-alleged-hacking-us-pr-firm-2024-05-02/>. The same prosecutor said a Washington-based PR and lobbying firm paid one of Mr. Forlit's companies £16 million "to gather intelligence." *Id.* The press coverage, citing U.S. authorities, says Mr. Forlit was arrested under an Interpol red notice at London's Heathrow Airport as he was trying to board an international flight to Israel. *Id.*

These allegations are very similar to what is alleged in Plaintiffs' Complaint. As the Court knows, the Complaint alleges that the Defendants engaged in a variety of criminal acts, including hacking. The Complaint alleges that Mr. Forlit, along with his companies Defendants Insight Analysis and Research LLC and SDC-Gadot LLC, "orchestrated the hacking and theft of private emails, and then assisted the Enterprise in covering up such conduct through the obstruction of U.S. judicial proceedings." Compl. ¶ 20. Mr. Forlit was also paid to write regular "Hacking Reports" containing stolen data that included plainly confidential business records and privileged communications, *id.* ¶¶ 51–53, 138, and he was paid handsomely for his work, *id.* ¶¶ 26(a), 51, 55–56, 235.

Although it is Plaintiff's position that that Defendants' motions to dismiss should be denied regardless of this recent development, and although criminal charges are not in and of themselves proof of guilt, the similarities between the crimes alleged by the United States and the actions alleged in Plaintiffs' Complaint related to Mr. Forlit should add to the credibility and plausibility of Plaintiffs' allegations generally.

Respectfully,

A handwritten signature in blue ink, appearing to read "T. O'Toole", with a stylized flourish at the end.

Timothy P. O'Toole

cc: Counsel of Record (Via CM/ECF)